

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

GURBIR S. GREWAL  
ATTORNEY GENERAL OF NEW JERSEY  
R.J. Hughes Justice Complex  
P.O. Box 116  
Trenton, New Jersey 08625  
Attorney for Defendants,  
Union County Prosecutor's Office, Mark Spivey,  
Patricia Cronin, Deborah White, and Stephen Kaiser  
By: Robert J. McGuire  
Deputy Attorney General

<p>KHASEEM GREENE,</p> <p>Plaintiff,</p> <p>v.</p> <p>ELIZABETH POLICE DEPARTMENT, et al.,</p> <p>Defendants.</p>	<p>CIVIL ACTION NO. 2:18-cv-08972</p> <p>NOTICE OF MOTION</p>
---	---

**PLEASE TAKE NOTICE** that on **September 4, 2018**, or as soon thereafter as counsel may be heard, the undersigned, attorney for Defendants Union County Prosecutor's Office, Mark Spivey, Patricia Cronin, Deborah White, and Stephen Kaiser ("Defendants") will apply to the United States District Court, District of New Jersey,


for an Order dismissing Plaintiff's claims with prejudice pursuant to Fed. R. Civ P. 12(b)(1) and (6) as to Defendants.

**PLEASE TAKE FURTHER NOTICE** that it is requested that the Court consider this motion on the papers submitted unless opposition is entered, in which case oral argument is requested.

In support of its motion, Defendants will rely upon the attached Brief.

A proposed form of Order is attached.

GURBIR S. GREWAL  
**ATTORNEY GENERAL OF NEW JERSEY**

By:   
Robert McGuire (046361992)  
Deputy Attorney General

DATE: July 30, 2018